

THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HUAWEI TECHNOLOGIES CO. LTD.,

Plaintiff,

v.

T-MOBILE US, INC. and
T-MOBILE USA, INC.,

Defendants,

NOKIA SOLUTIONS AND NETWORKS US
LLC, NOKIA SOLUTIONS AND
NETWORKS OY,
TELEFONAKTIEBOLAGET LM ERICSSON,
and ERICSSON INC.

Intervenors.

Civil Action No. 2:16-cv-00052-JRG-RSP
Civil Action No. 2:16-cv-00055-JRG-RSP
Civil Action No. 2:16-cv-00056-JRG-RSP
Civil Action No. 2:16-cv-00057-JRG-RSP

JURY TRIAL DEMANDED

JOINT MOTION IN *LIMINE*

The parties agree that counsel and witnesses will not mention, refer to, or offer any evidence or argument relating to any of the following topics within the hearing of any member of the jury panel, either in *voir dire* or at any time during trial:

1. The parties are precluded from making statements that are inconsistent with the Federal Judicial Center's patent video, and from praising or criticizing the performance, reliability, or credibility of the USPTO or the examiners that work at the USPTO. The parties are not precluded from introducing evidence that a particular prior art reference was or was not considered during prosecution of an asserted patent. The parties are also not precluded from arguing that an asserted claim is valid or invalid, or from making statements consistent with the Federal Judicial Center's patent video.
2. The parties are precluded from making statements referring to mock trials, jury research, jury consultants, or shadow juries.
3. No party shall reference or imply problems with intellectual property protection in China (e.g., that China doesn't adequately protect U.S. intellectual property)
4. No party shall reference or imply a relationship between Huawei and the Chinese government.
5. No party shall reference the military background of Mr. Ren Zhenfei, the CEO and founder of Huawei.
6. No party shall refer to any party's closure of offices or businesses in the United States.

Dated: August 14, 2017

Respectfully submitted,

By: /s/ Jonathan J. Lamberson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on August 14, 2017 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Jonathan J. Lamberson

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